

Davis Wright Tremaine LLP

ANCHORAGE LOS ANGELES NEW YORK BELLEVUE

PORTLAND

SAN FRANCISCO SEATTLE

SHANGHAI

WASHINGTON, D.C.

MARK P. TRINCHERO Direct (503) 778-5318 marktrinchero@dwt.com

SUITE 2300

1300 SW FIFTH AVENUE PORTLAND, OR 97201-5682 1300 SW FIFTH AVENUE

TEL (503) 241-2300 FAX (503) 778-5299

www.dwt.com

September 23, 2005

VIA E-FILING AND UPS NEXT DAY MAIL

Ms. Francis Nichols, Administrative Specialist Administrative Hearings Division PUBLIC UTILITY COMMISSION OF OREGON 550 Capitol Street N.E., Suite 215 Salem, Oregon 97301-2551

Re:

In the Matter of EDGE WIRELESS, LLC Application for Designation as an Eligible Telecommunications Carrier (ETP) to Provide OTAP Services

Dear Ms. Nichols:

Enclosed for filing is the "Application of Edge Wireless, LLC for Eligible Telecommunications Provider (ETP) to Provide OTAP Services". The original and five (5) copies of this document are being delivered via UPS next day mail.

The Commission designated Edge Wireless, LLC an Eligible Telecommunications Carrier on August 29, 2005 in Order # 05-965.

Please feel free to contact me if you have any questions.

Very truly yours,

Davis Wright Tremaine LLP

Mark P. Trinchero by D. Reed Mark P. Trinchero

MPT:djr

Enclosures

Oregon Telephone Assistance Program (OTAP)
Application for Eligible Telecommunications Provider (ETP) to Provide OTAP Services

| Part I. | Application Information and Service Plan | | |
|---------|--|--|--|
| 1. | Legal name of applicant: Edge Wireless, LLC ("Edge") | | |
| 2. | Name or names that applicant is doing business as: | | |
| 3. | Contact information pertaining to your designated staff who would be handling OTAP communication: | | |
| | Name: Kevin Keillor | | |
| | Address: 650 SW Columbia, Suite 7200 | | |
| | City: Bend State: OR Zip: 97702 | | |
| | Phone Number: 541-312-5430 Fax: | | |
| | E-Mail: kkeillor@edgewireless.com | | |
| 4. | Are you authorized to provide telecommunications services in the State of Oregon? | | |
| | Yes Oregon PUC Telecommunications Service Provider ID No. Note: Edge is a radio common carrier exempt from PUC jurisdiction. See ORS 759.005(2)(e) | | |
| | No Stee ORS 759.005 (2) (e) STOP. You must apply for and obtain Oregon PUC approval to offer telecommunications services in the State of Oregon before you can participate in the OTAP Program. | | |
| 5. | Are you currently designated as a federal Eligible Telecommunications Carrier (ETC) by the Oregon Public Utility Commission in the service areas where you intend to participate in OTAP? | | |
| | Yes Docket No. UM 1177 Order No. 05-965 | | |
| | No STOP. OTAP is an adjunct to the federal universal service fund Lifeline and Linkup programs. You must apply for and obtain designation as a federal Eligible Telecommunications Carrier (ETC) in those service areas where you intend to participate in OTAP. | | |
| | List the specific Oregon exchanges where you seek to participate in OTAP. If your current federal ETC service area is not coextensive with specific Oregon exchanges, please list the Incumbent Local Exchange Carrier (ILEC) wire centers where you are authorized as a federal ETC and intend to participate in OTAP. If additional space is required, please use a separate sheet of paper. | | |

Attached.

| Exchange or Wire Center | Incumbent ILEC |
|-------------------------|----------------|
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- 7. OAR 860-033-0005 states that an ETP must offer services under 47 CFR §54.101 using either its own facilities or a combination of its own facilities and resale of another carrier's services (including the services offered by another eligible telecommunications provider throughout the service area). Pursuant to 47 C.F.R. §54.201(f), the requirement of using their "own facilities" includes, but is not limited to, purchasing unbundled network elements from another carrier. On a separate sheet of paper, please provide the following for the service area in which the applicant seeks to participate in OTAP.
 - a. A general description of the telecommunications facilities owned and operated by the applicant (for example, switches, outside plant assets, fiber optic transmission equipment, ILEC collocations, etc.); Edge is a full service wireless carrier that offers Commercial Mobile Radio Service throughout its licensed service area utilitizing its own service including its own antennas, towers, and mobile b. A list of the ILECs from whom the applicant purchases unbundled networkswitching elements;
 - c. A list of the ILECs or other ETCs the applicant uses to provide resale service;
 - d. A list of interconnection agreements the applicant maintains with Oregon ILECs and the effective date of such agreements;

Citizens (3/2001); CenturyTel (2/2001); Qwest (6/2000); Verizon (6/2000)

- e. A list of interexchange carriers the applicant will use to provide interstate and intrastate toll services for its OTAP customers. AT&T (Intrastate/InterLATA & Interstate toll); Qwest (Intrastate/IntraLATA transport); Verizon (Intrastate/The number of residential, business and tribal basic service customers served by the
- The number of residential, business and tribal basic service customers served by the sport applicant as of December 31, of the most recent calendar year. Specify whether these customers are served by wireline service or wireless instruments.

38,391 residential lines 7,318 business lines

95 tribal lines

All customers are served by wireless instruments.

Part II. Conditions to Provide OTAP Services to Qualifying Oregonians

These conditions apply in addition to the general conditions of certification. Violating these conditions, or misrepresenting information provided to PUC in the course of administering the OTAP programs may result in cancellation of your Telecommunications Provider's Certificate, your authority to provide OTAP Services and/or an order requiring you to refund with interest and penalties of any OTAP support distributed under false information.

- The applicant agrees to offer reduced residential rates to eligible low-income customers pursuant to the Oregon Telephone Assistance program (OTAP). See OAR 860-033-0001 through 0046.
- 2. The applicant understands that only PUC may approve OTAP benefits for the consumer and provide benefits to OTAP consumers after PUC has notified the applicant of their eligibility. A telecommunication provider who grants OTAP benefits to ineligible customers will have the total amount of the OTAP benefits that were given to those customers deducted from the monthly or quarterly OTAP reimbursement invoices that the telecommunications provider submits to the Commission (OAR 860-033-0045 (1) (d)).
- 3. The applicant agrees that they will ensure the consumer will see their OTAP credit within 30 days from the date that the applicant has been notified of the consumer's eligibility status, and to remove consumers within 30 days after they no longer qualify for OTAP benefits.
- 4. The applicant agrees that if an OTAP consumer did not receive his or her benefits from the applicant after being approved by the Commission, that the applicant will reimburse the consumer up to a maximum of one year of OTAP benefits credited to their telephone line (OAR 860-033-0030 (7)).
- 5. The applicant agrees that they will submit reports for reimbursement quarterly (if they have less than 1,000 OTAP consumers) or monthly (if they have more than 1,000 OTAP consumers). Reports are expected to be submitted even if there are zero consumers (OAR 860-033-0045 (1)).
- 6. The applicant agrees that upon request, a qualifying OTAP recipient shall be entitled to toll limitation service from an eligible telecommunications carrier, when available, at no additional charge. Further, the applicant agrees not to deny or disconnect basic service to an OTAP customer for failure to pay toll charges, or require a deposit from OTAP consumers who voluntarily elect to receive toll-blocking services. (OAR 360-021-0200 (5), and 360-021-0335 (4) (b)).
- 7. An OTAP recipient is required to be the named subscriber to the local telecommunication service in order for that household to qualify for OTAP benefits. PUC may waive this requirement if it determines that good cause exists. Applicant agrees to comply with reimbursing OTAP consumers who are not named subscribers at the Commission's request.

- 8. The applicant agrees to ensure that confidential information (including phone number, addresses, contact information and social security numbers) of OTAP recipients is protected (OAR 360-033-0030 (5). The applicant agrees to maintain a written policy to ensure that the applicant's staff does not breach the confidentiality of OTAP consumers, and to do background checks on employees who have access to customer records.
- 9. The applicant agrees to have in place database encryption and firewall technologies to protect customer service information stored electronically.

APPLICANT UNDERSTANDS ALL OF THE ABOVE CONDITIONS

| AND AGREES TO ABIDE BY ALL AF RULES, STATE LAW AND THE CON PLEASE INITIAL BOX AT LEFT. | |
|--|--------------------|
| M/MP | Attorney |
| nature of Person Authorized to Represent Applicant | Title |
| Mark P. Trinchero | September 23, 2005 |

Date

Printed Name

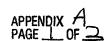
Exhibit B EDGE WIRELESS PROPOSED ETC AREA (NON-RURAL)

Verizon Northwest, Inc. Wire Centers in Coos, Curry, Douglas and Josephine Counties:

RDPTORXX (Reedsport)
LKSDORXX (Lakeside)
NBNDORXX (North Bend)
CSBYORXX (Coos Bay)
CQLLORXX (Coquille)
BNDNORXX (Bandon)
MYPNORXX (Myrtle Point)
LNGLORXX (Langlois)
PTORORXX (Port Orford)
PWRSORXX (Powers)
GLBHORXX (Gold Beach)
BKNGORXX (Brookings)
MRPHORXX (Murphy)
PRVTORXX (Provolt) *
EMPRORXX (Empire)

Qwest Corporation Wire Centers in Coos, Curry, Douglas and Josephine Counties:

STHROR58 (Sutherlin) RSBGOR57 (Roseburg) WNTNOR57 (Winston) GRPSOR29 (Grants Pass) *



^{*}Although Edge's BTA boundaries do not completely encompass the entire wire center, Edge will offer service throughout the entire wire center area.

Exhibit B List of Rural ILEC Wire Centers in Edge's Proposed ETC Area

Citizens Wire Centers in Coos, Curry, Douglas and Josephine Counties:

AZALORXA (Azalea) *
CNVLORXA (Canyonville)
CVJTORXA (Cave Junction)
DYCKORXX (Days Creek)
GLDORXA (Glendale)
MYCKORXA (Myrtle Creek)
OBRNORXX (O'Brien)
RDDLORXA (Riddle)
SELMORXA (Selma)
WLCKORXA (Wolf Creek)

Cascade Wire Centers in Coos, Curry, Douglas and Josephine Counties:

EKTNORXB (Elkton) SCBGORXA (Scottsburg)

CenturyTel Wire Centers in Coos, Curry, Douglas and Josephine Counties:

CMVLORXA (Camas Valley) DRANORXA (Drain) * GLIDORXA (Glide) NRUPORXA (North Umpqua) YNCLORXA (Yoncalla) *

United Wire Centers in Coos, Curry, Douglas and Josephine Counties:

DMLKORXX (Diamond Lake)

^{*}Although Edge's BTA boundaries do not completely encompass the entire wire center, Edge will offer service throughout the entire wire center area.